

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

KEITH COLE, JACKIE BRANNUM,
RICHARD KING, FRED WALLACE,
LAVAR SANTEE, and MARVIN RAY
YATES, individually and on behalf of
those similarly situated,
Plaintiffs,

V.

BRYAN COLLIER, in his official
capacity, ROBERTO HERRERA, in his
official capacity, and TEXAS
DEPARTMENT OF CRIMINAL
JUSTICE,
Defendants.

CIVIL ACTION NO. 4:14-CV-1698

DEFENDANTS' ADVISORY REGARDING DISCOVERY

TO THE HONORABLE JUDGE KEITH P. ELLISON:

Defendants are in the process of producing documents for *in camera* review in compliance with this Court's orders (Docs. No. 1568, 1570), as well as supplementing their production in compliance with the clarified temporal and geographic scope of discovery. While preparing discovery supplementation, Defendants have identified twenty-six additional documents responsive to Plaintiff's requests that Defendants believe are protected by the attorney-client privilege. Defendants file the attached supplement to their privilege log, identifying these documents and the basis for their assertion of privilege. *See Exhibit A.*

Defendants will include these additional twenty-six documents with the other documents submitted for the Court's *in camera* review in the manner prescribed in the Court's latest order (Doc. No. 1570).

Respectfully submitted,

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ATTORNEYS FOR DEFENDANTS

NOTICE OF ELECTRONIC FILING

I, **Charles K. Eldred** Attorney General of Texas, do hereby certify that I have electronically filed this pleading in accordance with the Electronic Case Files System of the Southern District of Texas, on June 12, 2020.

/s/ Charles K. Eldred
CHARLES K. ELDRED
Assistant Attorney General

CERTIFICATE OF SERVICE

I, **Charles K. Eldred**, Assistant Attorney General of Texas, certify that a true and correct copy of the foregoing has been served to all attorneys of record by electronic notice in accordance with Rule 5(b)(2) of the Federal Rules of Civil Procedure on June 12, 2020.

/s/ Charles K. Eldred
CHARLES K. ELDRED
Assistant Attorney General